

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

Aimee Maddonna,	)	Civil Action No.
	)	6:19-cv-00448-TMC
Plaintiff,	)	
	)	
v.	)	<b>MOTION TO DISMISS</b>
	)	
United States Department of Health and	)	
Human Services; Alex Azar, in his official	)	
capacity as Secretary of the United States	)	
Department of Health and Human	)	
Services; Administration for Children and	)	
Families, Department of Health and	)	
Human Services; Steven Wagner, in his	)	
official capacity as Principal Deputy	)	
Assistant Secretary of the Administration	)	
For Children and Families; Henry	)	
McMaster, in his official; capacity as	)	
Governor of the State of South Carolina;	)	
and Joan B. Meacham, in her official	)	
capacity as Acting State Director of the	)	
South Carolina Department of Social	)	
Services	)	
Defendants.	)	
	)	

Defendant Joan B. Meacham, in her official capacity as Acting State Director of the South Carolina Department of Social Services, moves this Court, pursuant to Rules 12(b)(1) and (6) of the Federal Rules of Civil Procedure for an Order dismissing, with prejudice, the claims asserted against her in this action. In further support of this Motion, this Defendant refers to, relies upon, and incorporates by reference ECF No. 12, the Motion to Dismiss filed by Defendant Henry McMaster, as well as ECF No. 12-1, the Memorandum in Support filed therewith, and its attachments.

This Defendant submits that if Defendant McMaster's Motion to Dismiss were to be granted, it would logically follow that Defendant Meacham should be dismissed for the same reasons.

Respectfully submitted,

DAVIDSON, WREN & PLYLER P.A.

*s/Kenneth P. Woodington*

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